

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DERRICK COLLINS,	)	
	)	
Plaintiff,	)	NO. 07 C 6255
	)	
v.	)	JUDGE MANNING
	)	
CITY OF CHICAGO,	)	
Chicago Police Officers	)	MAGISTRATE JUDGE KEYS
TERRENCE MORRIS, CHRIS SAVICKAS,	)	
And COURTNEY HILL	)	
Defendants.	)	

**DEFENDANTS AGREED MOTION  
FOR ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants, Terrence Morris, Chris Savickas, and Courtney Hill, by one of their attorneys, Thomas H. Freitag, Assistant Corporation Counsel for the City of Chicago, and Defendant, the City of Chicago, by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully request this Honorable Court, pursuant to FRCP 6(b)(1), to enlarge their respective times to answer or otherwise plead to Plaintiff's Complaint in this matter thirty (30) days from today's date, up to and including January 23rd, 2008.

In support of this motion, the undersigned state as follows:

1. I, the undersigned Thomas H. Freitag, am one of the Assistant Corporation Counsel of the City of Chicago assigned to represent the Defendants in this matter.
2. Due to administrative delays in processing the Defendants requests for representation, related to the recent filing of Plaintiff's Complaint on November 5th, 2007, it was only in the last week that the Individual Defense Litigation Division was first able to learn of the completed service on all Defendants.

3. We therefore have not had a chance to discuss the allegations contained in Plaintiff's Complaint with our clients in order to adequately answer or otherwise plead in this matter on their behalves. Answering on behalf of all Defendants at the same time will provide uniform briefing schedules as well as improved efficiencies for the Court.

4. We are therefore requesting a thirty (30) day enlargement of time from today, December 24th, 2007, to answer or otherwise plead for the served Defendants, up to and including January 23rd, 2008.

5. I discussed this matter with Plaintiff's counsel Mr. Louis Meyer on December 21, 2007 by telephone, and, under the circumstances, stated he had no objection to this motion.

6. Plaintiff has not been prejudiced by the delay in responding to his Complaint since the time service was had, and will not be prejudiced by the granting of this motion.

7. This motion is filed in good faith, and is not intended for the purpose of undue delay.

WHEREFORE, Defendants respectfully move this Honorable Court to enlarge their respective time thirty (30) days from today, up to and including January 23rd, 2008, to answer or otherwise plead in this matter.

Respectfully submitted,

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Chicago, Illinois 60602  
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Atty. No. 6272245

/s/ Thomas H. Freitag  
Thomas H. Freitag  
Assistant Corporation Counsel